IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Norfolk Division

UNITED STATES OF AMERICA,

Plaintiff,

v. Case No.: 2:10-cr-00089

CHARLES R. ENGLE,

Defendant.

DEFENDANT'S REQUEST FOR VOIR DIRE

Defendant Charles R. Engle, through counsel, submits this request for voir dire pursuant to Local Criminal Rule 30. Engle respectfully requests that the Court question potential jurors on the following matters in addition to the standard questions.

- 1. Do you know any of the other potential jurors?
- 2. Have you or a family member worked for a bank, a mortgage lending company or a business engaged in the collection of debts? If so, please describe that employment.
- 3. Have you, a family member, or a close friend ever been the victim of a crime? If so, describe the nature of that incident.
- 4. Have you, any family member, or a close friend been employed by the Federal, State, or local government? If so, please describe each such employment situation.
- 5. Do you have any regular associations, whether as friends, relatives, or otherwise, with people employed by any law enforcement agency? If so, please describe each such association.
- 6. Have you ever served on a jury in a criminal case? If so, please describe each such situation, including particularly whether you served as the foreperson.

- 7. Have you ever served on a jury in a civil case? If so, please describe each such situation, including whether you served as the foreperson. Do you understand that in this case, the Government has a greater burden of proof, which is proof beyond reasonable doubt, than the burden of proof in a civil case, which is only a preponderance of the evidence or the "greater weight" of the evidence?
- 8. Have you ever served on a grand jury? If so, please describe each such situation. Do you understand that in this trial, the Government has a greater burden of proof, which is proof beyond a reasonable doubt, than with a grand jury?
- 9. Have you, or has anyone close to you, had contacts with the criminal justice system? If so, please explain each such situation. Do you believe that any of those experiences will affect your ability to sit on this jury?
- 10. Have you, any family member, or a close friend ever donated time or money to a "crime watch" or "neighborhood watch" group? If yes, please identify the group and describe your involvement.
- 11. Have you or an immediate family member ever obtained a loan from a bank or a mortgage company in order to buy a home or other real estate? If so, please describe the process you (or your family member) went through in applying for and obtaining the loan.
 - 12. Have you or an immediate family member ever had a real estate loan foreclosed?

Respectfully submitted,

CHARLES R. ENGLE

By: /s/ Hunter W. Sims, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of September 2010, a true copy of the foregoing **Defendant's Request for Voir Dire** has been electronically filed with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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